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REMARKS

In response to the office action mailed October 17, 2005, applications provide the following. No amendments have been made to the pending claims, therefore, claims 1-10 remain pending. Reconsideration of the present application in view of the following remarks is respectfully requested.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone Thomas F. Lebens at (805) 781-2865 so that such issues may be resolved as expeditiously as possible.

Claim rejections under 35 U.S.C. §102

The office action has rejected pending claims 1-10 as being anticipated by U.S. Patent No. 5,909,551 to Tahara et al. Applicants respectfully traverse these rejections as the Tahara patent fails to teach each limitation of claims 1-10 and instead teaches away from claim 1-10. More specifically, claim 1 for example recites in part:

generating authoring output comprising a definition for a variable...;
selecting a source file, the source file comprising the variable;
searching the source file for the variable, and replacing the variable with the definition for the variable;
generating programmatic content in response to the searching.... (claim 1, emphasis added).

Applicants respectfully submit that the Tahara patent does not teach or suggest at least “generating programmatic content in response to the search” or “searching the source file for the variable, and replacing the variable with the definition for the variable”, and instead teaches away from searching the source file and replacing the variable with the definition.

The Tahara patent fails to teach or suggest at least “generating programmatic content in response to the searching” as recited in claim 1. The office action on page 3 suggests that Tahara describes “generating programmatic content (HTML 2306; PC 2307 – Fig. 23)”.

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However, the HTML 2306 and PC 2307 of Fig. 23 are storage areas to receive already generated files. The HTML 2306 and PC 2307 is not programmatic content generated in response to the searching of the source file, and instead is previously written files that are recorded on the medium 2301, and not generated in response to the searching of the source file. Therefore, the Tahara patent fails to teach or suggest “generating programmatic content in response to the searching as recited in claim 1, and thus claim 1 is not anticipated by the Tahara patent.

Further, the office action truncated the claim limitation of “generating programmatic content in response to the searching” as recited in claim 1 (emphasis added). The office action instead on page 3 only suggests that the Tahara patent describes “generating programmatic content (HTML 2306; PC 2307 – Fig. 23)” and fails to show how the Tahara patent generates programmatic content in response to the searching. As demonstrated above, the Tahara patent does not teach or suggest generating programmatic content in response to the searching, and instead only describes recording already written files to the medium. Therefore, the Tahara patent fails to teach or suggest all of the limitations of at least claim 1, and thus, claim 1 is not anticipated by the Tahara patent.

Additionally, the Tahara patent fails to teach or suggest at least “searching the source file for the variable, and replacing the variable with the definition for the variable” as recited in claim 1. The office action attempts to equate HTML links to additional content (i.e., “IMG SRC=” and “A HREF=” of FIG. 27-28 of the Tahara patent, see office action page 2) with the claimed definitions for variables, and attempts to suggest that the accessing of the HTML content is equivalent with replacing variables with definitions as claimed. However, HTML links (e.g., “A HREF = ‘PAGE001.HTM’” of FIG. 27a) are just links to the content (i.e., links to the PAGE001.HTM content of FIG. 27b) and there is no replacing in the resulting linked content with the link to itself (e.g., there is no replacing in PAGE001.HTM content of FIG. 27b with the “definition” of a link to PAGE001.HTM (i.e., the “A HREF= ‘PAGE001.HTM’”). Further, one skilled in the art would not incorporate a link back to the displayed content because

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the content is already accessed (i.e., one skilled in the art would not replace a variable in the PAGE001.HTM content with a link to the PAGE001.HTM content).

The "A HREF=" is a URL "Hypertext REference" link to additional HTML content and the "IMG SRC=" is a URL link to image graphics content. These are links to additional content. There is no replacing in the linked additional content with a link to itself as suggested by the office action. Therefore, the Tahara patent does not teach or suggest at least "searching the source file for the variable, and replacing the variable with the definition for the variable" as recited in claim 1 (emphasis added). Further, one skilled in the art would not replace a variable in the HTML content with a link back to itself (i.e., a link from the HTML content back to the same HTML content).

The office action on page 3 specifically states "Note: variable enclosed and defined within markup tags and being replaced by corresponding html page/file or image data...." Therefore, the office action clearly demonstrates that the "IMG SRC=" and the "A HREF=" are links to content and these links are not replaced into variables of the linked "corresponding html page/file or image data" (office action page 3).

Furthermore, the office action has disassociate the cooperation within the claims disregarding the claim language stating "searching the source file for the variable, and replacing the variable with the definition for the variable" and instead separates the "searching" and the "replacing". However, at least claim 1 does not simply state "replacing the variable", but instead recites "searching the source file for the variable" and then "replacing the variable" with the definition. The office action on page 3 specifically states "Note: variable enclosed and defined within markup tags and being replaced by corresponding html page/file or image data..." (emphasis added). This statement in the office action only demonstrates that separate HTML content is accessed based on the link, and does not describe searching the source file and replacing a variable with a definition. Even if it is assumed arguendo that linking to content is equivalent to replacing a variable with a definition, the Tahara patent does not show searching a source file and replacing the variable of the source file. Instead, Tahara only describes linking to separate content, not replacing the variable in the source file with a definition. The office action

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has disassociated the “replacing the variable” from the “searching the source file”. Applicants respectfully submit that at least claim 1 recites “searching a source file ... and replacing the variable”, not just replacing the variable, or just searching the source file. The Tahara patent does not teach or suggest at least “searching the source file ... and replacing the variable” as claimed.

Still further, the office action has equated both “generating a authoring output...” and “generating programmatic content...” to the same elements of the Tahara patent. Thus, the office action effectively is impermissibly reading at least one of the “generating a authoring output” and “generating programmatic content” right out of the claim. Specifically, the office action on page 2 states “generating a authoring output ... (e.g. elements 2301, 2305, 2306, 2307 – Fig. 23 ...”, and states on page 3 “generating programmatic content (HTML 2306; PC 2307 – Fig. 23)” (emphasis added). Therefore, the office action suggests that “generating a authoring output” and “generating programmatic content” are the same thing, impermissibly reading one of the “generating a authoring output...” and the “generating programmatic content...” right out of the claim. The Tahara patent does not teach or suggest at least both “generating a authoring output” and “generating programmatic content” as recited, for example, in claim 1. Therefore, at least claim 1 is not anticipated by the Tahara patent.

Independent claims 8-10 include claim language similar to that of claim 1. Therefore, the above presented arguments can be applied to claims 8-10 and thus independent claims 8-10 are also not anticipated by the Tahara patent.

Similarly, claims 2-7 depend from claim 1. Applicants have demonstrated above that claim 1 is not anticipated in view of the Tahara patent. Therefore, claims 2-7 are also not anticipated by the Tahara patent due at least to their dependency on claim 1.

Applicants have demonstrated that the Tahara reference does not teach all of the limitations of claims 1-10, or make obvious pending claims 1-10. Instead, Applicants have demonstrated in response to the three previous office actions that the Tahara patent fails to teach

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each element as claimed and instead that the Tahara patent teaches away from the methods and systems as claimed. Further, the Examiner in two previous office actions specifically stated that the Tahara patent "does not explicitly specify selecting a source file, searching the source file for a variable, and replacing the variable with the definition for the variable and generating a programmatic content therefrom" and relied on other references for these limitations. (Office Action mailed 2-13-04, page 3). Applicants have again demonstrated above that the Tahara patent fails to teach or suggest all of the limitations of the claims and that instead the Tahara patent specifically teaches away from the pending claims 1-10, and that claims 1-10 are in condition for allowance. Therefore, Applicants respectfully request that the Examiner issue a notice of allowance.

CONCLUSION

In view of the above, Applicants submit that the pending claims are in condition for allowance, and prompt and favorable action is earnestly solicited.

Respectfully submitted,



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